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September 30, 2019

Dion Novak, Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
Superfund Division – Remedial Response Branch 2
Remedial Response Section 3 SR-6J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

RE: Information Request – Franklin Street Groundwater Site, Spencer, IN

Dear Mr. Novak:

We represent Finzer Indiana Real Estate, LLC ("Finzer Real Estate") in connection with its response to USEPA's Request for Information regarding the Franklin Street Groundwater Site in Spencer, Indiana dated July 22, 2019. Finzer Real Estate was granted an extension to respond to USEPA's Request for Information until September 30, 2019.

In connection with preparation of these responses, Finzer Real Estate understands that USEPA has defined the "Site" as consisting of "all property or areas described in the Hazard Ranking documentation record as within a 66.54-acre groundwater plume…" Also, the time period being investigated is 1950 to the present.

Finzer Real Estate purchased property located at 650 Market Street as well as two additional parcels located immediately south and east of 650 Market Street ("Property") from Casebeer & Sons. These purchases occurred in 2005 and subsequent years. The Property is located several blocks west of the Site, as defined by USEPA. The Property is adjacent to the Riverside Cemetery and across Market Street from the Spencer Sewer Department. Finzer Real Estate sold the Property in 2018 to Tri-State Lumber.

In 1991, Finzer Roller of Indiana (n/k/a Finzer Roller, Inc. "Finzer Roller") purchased the assets of Benchmark Roller and Supply Company ("Benchmark") that had been operating a rubber roller refurbishing facility on the Property. Finzer Roller does not know how long Benchmark was operating on the Property prior to Finzer Roller's purchase of its assets. Finzer Roller leased the Property from Casebeer & Sons beginning in 1991 and continued rubber roller refurbishing operations on the Property until 2018.

Accordingly, all responses provided below are being submitted on behalf of both Finzer Real Estate and Finzer Roller (Collectively, "Finzer Roller").

QUESTIONS

I Identify all persons consulted in the preparation of the answers to these Information Requests.

ANSWER:

Lee Barnes – Former Plant Manager of Spencer, IN. facility.
Mike Hefner – CFO, Finzer Roller, Inc.
Marty Finzer-VP, Finzer Roller, Inc.
Mark Steger- Outside Counsel to Finzer Roller, Inc., Clark Hill, PLC.

2. Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

ANSWER: Finzer Indiana Real Estate real estate records, Finzer Roller business operation records, including Accounts Payable data and Safety Data Sheets.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

ANSWER: See response to Question No. 6.

4. List the EPA Identification Numbers of the Respondent.

ANSWER: N/A

5. Identify the acts or omissions of any persons, other than your employees, contractors, or agents that may have caused the release or threat of release of hazardous substances, pollutants or contaminants and damages resulting therefrom.

ANSWER: Finzer Roller has no knowledge of any such acts or omissions with respect to the Site.

6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances by you, your contractors or by prior owners and/or operators.

ANSWER: Lee Barnes, current Finzer Roller employee and former manager of the Spencer, Indiana facility, is the most knowledgeable about Finzer Roller's generation, transportation, treatment, disposal or other handling of hazardous substances used in the rubber roller refurbishing operations conducted by Finzer Roller. Finzer Roller has no information on any person having such knowledge by Finzer Roller's contractors or prior owners/operators.

7. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials? If the answer to the preceding question is anything but an unqualified "no", identify:

(a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;
(b) Who supplied you with such hazardous substances;
(c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
(d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;
(e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and
(f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

ANSWER: Finzer Roller's rubber roller refurbishing operations used approximately 50 gallons of adhesives per year. Adhesives used were manufactured by Lord Corporation and supplied by Chem-Rep of Chicago and were stored in flammable-resistant cabinets. Finzer Roller used approximately 75 gallons per year of isopropyl alcohol which was supplied by Superior Oil and Supply and stored in flammable-resistant cabinets. Finzer Roller purchased approximately 120,000 lbs. of uncured rubber annually. Main rubber suppliers were Ace Elastomer, Hexpol, and Laur Silicone. Finally, waste rubber material was contained in a dumpster on-site and periodically removed from the Property by Republic Services when full. Monthly amounts disposed of ranged from 1000 to 1200 pounds.

8. Have you or any other person working with you or on your behalf ever accepted waste materials for transportation to the Site (to transshipment site) from any person? If the answer to this question is anything but an unequivocal no, identify:

(a) The persons from whom you or such other persons accepted waste materials for transport to the Site;
(b) Every date on which waste materials were so accepted or transported;
(c) For each transaction, the nature of the waste materials accepted or transported, including the chemical content, characteristics, physical state (e.g., solid, liquid) and the process for which the material was used or the process which generated the material;
(d) For each material, describe any warnings given to you with respect to its handling;
(e) The owner of the materials so accepted or transported;
(f) The quantity of the material involved (weight or volume) in each transaction and the total quantity for all transactions;
(g) All tests or analyses and analytical results concerning each material; and
(h) The price charged for transport and/or disposal per drum, barrel, container, load (or whatever unit used) of waste materials brought to the Site).

ANSWER: No

9. Describe the nature of your activities or business at the Site, with respect to purchasing, receiving, processing, storing, treating, disposing or otherwise handling hazardous substances or materials at the Site.

ANSWER: Finzer Roller has not conducted any activities or business at the Site.

10. State the dates during which you owned, operated or leased the Site and provide copies of all documents evidencing or relating to such ownership, operation or lease arrangement (e.g., deeds, leases).

ANSWER: Finzer Roller never owned, operated or leased the Site.

11. Provide information about the Site, including but not limited to the following:

(a) Property boundaries, including a written legal description;
(b) Location of underground utilities (telephone, electrical, sewer, water main, etc.);
(c) Surface structures (e.g., buildings, tanks);
(d) Ground water wells, including drilling log;
(e) Storm water drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s) and other underground structures; and where, when and how such systems are emptied;
(f) Any and all additions, demolitions or changes of any kind on, under o about the Site, to its physical structures or to the property itself (e.g., excavation work); and any planned additions, demolitions or other changes to the Site; and
(g) All maps and drawings of the Site in your possession.

ANSWER: Finzer Roller does not have any such information about the Site.

12. Identify all past and present solid waste units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas) on the Site (or your property). For each such solid waste unit identified, provide the following information:

(a) A map showing the unit's boundaries and the location of all known solid waste units whether currently in. operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;
(b) The type of unit (e.g., storage area, landfill, waste pile), and the dimensions of the unit;
(c) The dates that the unit was in use;
(d) The purpose and past usage (e.g., storage, spill containment);
(e) The quantity and types of materials (hazardous substances and any other chemicals) located in each unit;
(f) The construction (materials, composition), volume, size, dates of cleaning and condition of each unit; and

(g) If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

ANSWER: There were no solid waste units located on the Property during 1991-2018. Finzer Roller does not have any knowledge about solid waste on the Site.

13. Identify the prior owners of the Site. For each prior owner, further identify:

(a) The dates of ownership;
(b) All evidence showing that they controlled access to the Site; and
(c) All evidence that a hazardous substance, pollutant or, was released or threatened to be released at the Site during the period that they owned the Site.

ANSWER: Finzer Roller does not have any information on prior owners of the Site.

14. Identify the prior operators, including lessors, of the Site. For each such operator, further identify:

(a) The dates of operation;
(b) The nature of prior operations at the Site;
(c) All evidence that they controlled access to the Site; and
(d) All evidence that a hazardous substance, pollutant or contaminant was released or threatened to be released at or from the Site and/or its solid waste units (-luring the period that they were operating the Site.

ANSWER: Finzer Roller does not have any information on prior operators of the Site.

15. Provide copies of all local, state and federal environmental permits ever granted for the facility or any part thereof (e.g., RCRA permits, National Pollutant Discharge Elimination System permits).

ANSWER: Air Registration (8/2/05) and Air Revocation of Registration (12/20/18). Documents enclosed.

16. Did the facility ever have "interim status" under RCRA? If so, and the facility does not currently have interim status; describe the circumstances under which the facility lost interim status.

ANSWER: No

17. Did the facility ever file a notification of hazardous waste activity under RCRA? If so, provide a copy of such notification.

ANSWER: No

18. Provide all reports, information or data related to soil, water (ground and surface) or air quality and geology/hydrogeology at and about the Site. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

ANSWER: Finzer Roller does not have any such information about the Site.

19. Are you or your consultants planning to perform any investigations of the soil; water (ground or surface), geology, hydrology or air quality on or about the Site? If so, identify:

(a) What the nature and scope of these investigations will be;
(b) The contractors or other persons that will undertake these investigations;
(c) The purpose of the investigations;
(d) The dates that such investigations will take place and be completed; and
(e) Where on the Site such investigations will take place.

ANSWER: No

20. Identify all leaks, spills or releases into the environment of any hazardous substances, pollutants or contaminants that have occurred at or from the Site. In addition identify:

(a) When such releases occurred;
(b) How the releases occurred;
(c) The amount of each hazardous substances; pollutants or contaminants so released;
(d) Where such releases occurred;
(e) Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release;
(f) Any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken; and
(g) All persons with information relating to these releases.

ANSWER: Finzer Roller does not have any such information about the Site.

21. Was there ever a spill, leak, release or discharge of hazardous materials into any subsurface disposal system or floor drain inside or under the (Finzer Roller--Name of PRP) building? if the answer to the preceding question is anything but an unqualified "no," identify:

ANSWER: No.

(a) Where the disposal system or floor drains were located;
(b) When the disposal system or floor drains were installed;
(c) Whether the disposal system or floor drains were connected to pipes;
(d) Where such pipes were located and emptied;

(e) When such pipes were installed;
(f) How and when such pipes were replaced, or repaired; and
(g) Whether such pipes ever leaked or in any way released hazardous materials into the environment.

22. Did any leaks; spills or releases of hazardous materials occur on the Site when such materials were being:

(a) Delivered by a vendor;
(b) Stored (e.g., in any tanks, drums or barrels);
(c) Transported or transferred (e.g., to or from any tanks, drums, barrels or recovery units); and
(d) Treated.

ANSWER: Finzer Roller does not have any such information on the Site.

23. Has soil ever been excavated or removed from the Site? Unless the answer to the preceding question is anything besides an unequivocal "no," identify:

ANSWER: Finzer Roller does not have any such information about the Site.

(a) Amount of soil excavated;
(b) Location of excavation;
(c) Manner and place of disposal and/or storage of excavated soil;
(d) Dates of soil excavation;
(e) Identity of persons who excavated or removed the soil;
(f) Reason for soil excavation;
(g) Whether the excavation or removed soil contained hazardous materials and why the soil contained such materials; and
(h) All analyses or tests and results of analyses of the soil that was removed from the Site.

24. Provide a list of the customers you supplied hazardous substances to between (date) and (date).

ANSWER: Finzer Roller supplies its customers with new or refurbished rubber rollers for use in their operations.

If you should have any questions with respect to these responses, please feel free to contact me.

Sincerely yours,

Mark J. Steger

MJS: tb
Enclosures

Enclosure D
Information Request
Franklin Street Groundwater Site

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of the Respondent and that the foregoing is complete, true, and correct.

Executed on SEPTEMBER 27, 2019

Martin Fenzel
Signature

MARTIN FENZEL
Type or Print Name

MANAGER
Title

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: August 2, 2005

RE: Finzer Roller of Indiana, Inc / 119-18864-00017

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FN-REGIS.dot 1/10/05

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
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www.IN.gov/idem

Mr. Leland E. Barnes
Finzer Roller of Indiana, Inc.
650 West Market Street
Spencer, Indiana 47460

August 2, 2005

Re: Registered Operation Status, 119-18864-00017

Dear Mr. Barnes:

The application from Finzer Roller of Indiana, Inc. received on April 19, 2005, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following rubber roller refurbishing plant, located at 650 West Market Street, Spencer, Indiana, is classified as registered:

(a) Six (6) rubber grinding machines with a combined maximum production rate of 55 pounds of rubber covered rollers per hour, controlled by a cyclone and baghouse in series.

(b) One (1) autoclave unit used for rubber curing at a maximum throughput rate of 96.4 pounds of rubber material per hour.

(c) One (1) final inspection process, using ISO alcohol to clean the roller surface before the final packaging using a maximum of 0.125 gallons of ISO alcohol per hour.

(d) Four (4) natural gas-fired space heaters with a combined maximum heat input capacity of 0.55 MMBtu per hour.

The following conditions shall be applicable:

(a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (sixty (60) readings in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from each of the six (6) rubber grinding machines shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

In order to comply with the above rule, the cyclone and baghouse for particulate control shall be in operation and control emissions from the six (6) rubber grinding machines at all times that any of the six (6) rubber grinding machines are in operation.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Ms. Sanober Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call (800) 451-6027, ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Nysa James, Section Chief
Permits Branch
Office of Air Quality

ERG/SD

cc: File – Owen County
Owen County Health Department
Air Compliance – Jim Thorpe
Permit Tracking
Compliance Data Section
Office of Enforcement

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Finzer Roller of Indiana, Inc.
Location:	650 West Market Street, Spencer, Indiana 47460
County:	Owen
SIC Code:	3061
Registration No.:	119-18864-00017
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from Finzer Roller of Indiana, Inc. relating to the operation of a stationary rubber roller refurbishing plant.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units and pollution control devices:

(a) Six (6) rubber grinding machines with a combined maximum production rate of 55 pounds of rubber covered rollers per hour, controlled by a cyclone and baghouse in series.

(b) One (1) autoclave unit used for rubber curing at a maximum throughput rate of 96.4 pounds of rubber material per hour.

(c) One (1) final inspection process, using ISO alcohol to clean the roller surface before the final packaging using a maximum of 0.125 gallons of ISO alcohol per hour.

(d) Four (4) natural gas-fired space heaters with a combined maximum heat input capacity of 0.55 MMBtu per hour.

Permitted Emission Units and Pollution Control Equipment

There are no permitted emission units operating at this source during this review process.

Existing Approvals

No previous approvals have been issued to this source.

Enforcement Issue

IDEM is aware that the source did not apply for a Registration in a timely manner. IDEM is reviewing this matter and will take appropriate action.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 19, 2004, with additional information received on August 22, 2004, December 5, 2004, January 26, 2005, and June 6, 2005.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 6).

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/year)
PM	15.0
PM10	15.0
SO_2	0.001
VOC	3.30
CO	0.20
NO_x	0.24

HAPs	Potential to Emit (tons/yr)
Carbon Disulphide	2.55
Benzene	5.06E-06
Dichlorobenzene	2.89E-06
Formaldehyde	1.81E-04
Hexane	4.34E-03
Toluene	8.19E-06
Total	2.55

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM and PM10 is less than 25 tons per year and greater than 5 tons per year. The potential to emit of all other criteria pollutants is less than five (5) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year.

(c) Fugitive Emissions
Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset.

County Attainment Status

The source is located in Owen County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
8-Hour Ozone	Attainment
1-Hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Owen County has been classified as unclassifiable or attainment for PM2.5. U.S.EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Owen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(c) Owen County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(d) Fugitive Emissions
Since this type of operation is not in one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicabilities.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	15.0
PM10	15.0
SO_2	0.001
VOC	3.30
CO	0.20
NO_x	0.24
Single HAP	<10
Combination HAPs	<25

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

(a) These emissions were based on the potential to emit calculations for the source (see Appendix A).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,

(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and

(c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this registration for this source.

(b) This source is not subject to the requirements of 40 CFR 60, Subpart BBB – New Source Performance Standards for Rubber Tire Manufacturing because it does not manufacture tires.

(c) This source is not subject to the requirements of 40 CFR Part 63, Subpart XXXX - National Emission Standards for Hazardous Air Pollutants (NESHAPs) - Rubber Tire Manufacturing (326 IAC 20) because the source does not manufacture tires and it does not have potential to emit hazardous air pollutants (HAP) at greater than 10 tons per year for a single HAP and greater than 25 tons per year for total HAPs.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61, and 40 CFR Part 63) included in this registration for this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Finzer Roller of Indiana, Inc. was built after August 7, 1977 and was a minor source at the time of its construction. It is not one of the 28 listed source categories. The source was modified in 1995 to add a baghouse to control particulate emissions generated from six (6) rubber grinding machines. This modification did not result in potential to emit of any criteria pollutant above major source threshold levels for PSD. Therefore, the source remains a minor PSD source and it is not subject to the requirements of 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

This source is located in Owen County and is not required to operate pursuant to 326 IAC 2-7, Part 70 Permit Program. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this rubber roller manufacturing plant emits less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – Autoclave Unit, Grinding Machines

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) For process weight rate of less than 100 tons per year, the six (6) rubber grinding machines each with a process weight rate of 6.00 pounds per hour shall not exceed 0.551 pounds of PM per hour [326 IAC 6-3-2(e)(2)].

Based on the uncontrolled potential to emit calculations (Appendix A, page 1 of 6), the particulate emissions from each of the six (6) rubber grinding machines is equal to 0.57 pounds per hour which is greater than the 0.551 pounds per hour limit [326 IAC 6-3-2(e)(2)]. Therefore, the Permittee must operate the cyclone and baghouse at all times when any of the six (6) rubber grinding machines are in operation in order to comply with the above rule.

(b) The autoclave unit is not subject to the provisions of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) because it does not emit particulates.

326 IAC 8-1-6 (New Facilities - General Reduction Requirements)

(a) Although constructed after January 1, 1980, the operation of the autoclave unit results in potential emissions of VOC less than twenty-five (25) tons per year. Therefore, the provisions of 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) do not apply.

(b) The six (6) rubber grinding machines do not emit VOC. Therefore, the provisions of 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) do not apply.

326 IAC 8-5-4 (Pneumatic Rubber Tire Manufacturing)

The source is not subject to the provisions of 326 IAC 8-5-4 because it does not manufacture pneumatic rubber or passenger type tires.

State Rule Applicability – Final Inspection Process

326 IAC 8-1-6 (New Facilities - General Reduction Requirements)

The potential VOC emissions from the final inspection area using ISO alcohol to clean the roller surface before final packaging are less than twenty-five (25) tons per year. Therefore, the provisions of 326 IAC 8-1-6 (New Facilities – General Reduction Requirements) do not apply.

State Rule Applicability – Natural Gas-Fired Space Heaters

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The natural gas-fired building heater is not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the particulate emissions from this unit are from combustion only.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired space heaters are not subject to the requirements of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because these units are not boilers or process heaters. They are used for comfort heating.

Conclusion

The operation of this rubber roller refurbishing plant shall be subject to the conditions of the Registration No.: 119-18864-00017.

Appendix A: Emission Calculations
Particulate Emissions
From Six (6) Rubber Grinding Machines

Company Name: Finzer Roller of Indiana, Inc.
Address: 650 West Market Street, Spencer, Indiana 47460
Registration: 119-18864
Plt ID: 119-00017
Reviewer: ERG/SD
Date: June 16, 2005

Control Equipment = Cyclone/Baghouse		PTE of PM/PM10 (tons/year) After Control	PTE of PM/PM10 (tons/year) Before Control
Outlet Grain Loading in grains/acf =	0.001	0.15	15.0
Air Flow Rate in acf/min =	4000		
Control Efficiency in %	99.0%		

* Assume all PM emissions are equal to PM10.

METHODOLOGY
PTE of PM/PM10 After Control (tons/year) = Outlet grain loading (grains/acf) * Air flow rate (acf/minute) * 60 minutes/hour * 1 lb/ 7000grains * 8760 hours/year * 1 ton/2000 lbs.
PTE of PM/PM10 Before Control (tons/year) = Outlet grain loading (grains/acf) * Air flow rate (acf/minute) * 60 minutes/hour * 1 lb/ 7000grains * 8760 hours/year * 1 ton/2000 lbs * (1 - Control Efficiency %)

Appendix A: Emission Calculations
VOC Emissions
From Final Inspection Area

Company Name: Finzer Roller of Indiana, Inc.
Address: 650 West Market Street, Spencer, Indiana 47460
Registration: 119-18864
Plt ID: 119-00017
Reviewer: ERG/SD
Date: June 16, 2005

Emission Unit	Density (lbs/gal)	Max. Usage Rate (gal/hour)	Volatile Content (%)	PTE of VOC (tons per year)
Final Inspection Area	1.26	0.125	100%	0.69

METHODOLOGY

PTE of VOC control (tons/year) = Density (lbs/gal) * Max. usage rate (gal/hour) * Volatile content (%) * 1ton/2000 lb * 8760 hours/year

Appendix A: Emission Calculations
Four (4) Natural Gas Fired Heaters

Company Name: Finzer Roller of Indiana, Inc.
Address: 650 West Market Street, Spencer, Indiana 47460
Registration: 119-18864
Plt ID: 119-00017
Reviewer: ERG/SD
Date: June 16, 2005

Heat Input Capacity (MMBtu/hour)	Potential Throughput (MMCF/year)
0.55 (4 units total)	4.82

	Pollutant					
	* PM	* PM10	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84
Potential To Emit (tons/year)	0.02	0.02	0.001	0.24	0.01	0.20

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.
**Emission factor for NOx (Uncontrolled) = 100 lb/MMCF.

METHODOLOGY
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Four (4) Natural Gas Fired Heaters

Company Name: Finzer Roller of Indiana, Inc.
Address: 650 West Market Street, Spencer, Indiana 47460
Registration: 119-18864
Plt ID: 119-00017
Reviewer: ERG/SD
Date: June 16, 2005

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	5.06E-06	2.89E-06	1.81E-04	4.34E-03	8.19E-06

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	1.20E-06	2.65E-06	3.37E-06	9.15E-07	5.06E-06

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
VOC and HAP Emissions
From One (1) AutoClave Curing

Company Name: Finzer Roller of Indiana, Inc.
Address: 650 West Market Street, Spencer, Indiana 47460
Registration: 119-18864
Plt ID: 119-00017
Reviewer: ERG/SD
Date: June 16, 2005

** Material	Emission Unit	Max. Usage Rate (lb/hour)	* Emission Factor for VOC (lb pollutant / lb rubber)	PTE of VOC (lb/hour)	PTE of VOC (ton/year)	* Emission Factor for Total HAP (lb pollutant / lb rubber)	PTE of HAP (lb/hour)	PTE of HAP (ton/year)
EPDM Sulfur Cure	Autoclave	96.4	6.15E-03	0.59	2.60	6.04E-03	0.58	2.55

The type of materials used at the source include Neoprene, Hypalin, Nitrile, SBR, EPDM, Silicone and Natural Rubber.
* Emission factor for VOC and HAP are worst case basis from Rubber Manufacturers Association (RMA), Table 4.12-9 - Autoclave Curing.
** Ethylene-Propylene-Diene-Mixture 1 (EPDM Sulfur Cure) results in Carbon Disulphide emissions.

METHODOLOGY
Potential To Emit (lb/hour) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber)
Potential To Emit (ton/year) = Max. Usage Rate (lb/hour) * Emission Factor (lb pollutant / lb rubber) * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emission Calculations
Summary

Company Name: Finzer Roller of Indiana, Inc.
Address: 650 West Market Street, Spencer, Indiana 47460
Registration: 119-18864
Plt ID: 119-00017
Reviewer: ERG/SD
Date: June 16, 2005

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	SO_2	NOx	VOC	CO
Grinding Machines (A)	15.0	15.0				
Final Inspection Area (B)					0.69	
Combustion Units (C)	0.02	0.02	0.001	0.24	0.01	0.20
Rubber Curing (D)					2.60	
TOTAL	15.0	15.0	0.001	0.24	3.30	0.20

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov
Eric J. Holcomb
Governor
Bruno L. Pigott
Commissioner

December 20, 2018

Mr. Martin Finzer
Finzer Roller of Indiana Inc.
129 Rawls Road
Des Plaines IL, 60018

Re: 119-40813-00017
Revocation of Registration No. R119-18864-00017
Master Agency Interest ID.: 61762

Dear Mr. Finzer:

Finzer Roller Indiana Inc. was issued a registration No. R119-18864-00017 on August 2, 2005, for a stationary rubber roller refurbishing plant, located at 650 West Market Street, Spencer, Indiana, 47460. On December 12, 2018, the Office of Air Quality (OAQ) received a letter from the source requesting that the registration be revoked, since the source has ceased operations.

Pursuant to 326 IAC 2-1.1-9, any permit to construct or operate or any permit revision approval granted by the commissioner may be revoked for any cause that establishes in the judgment of the commissioner the fact that continuance of the permit or permit revision approval is not consistent with the purposes of 326 IAC 2. Since the source is no longer in operation, the registration is no longer required.

The registration No. R 119-18864-00017 issued on August 2, 2005, is hereby revoked. Pursuant to IC 4-21.5-3-5(a) and (b), this revocation letter is effective in eighteen (18) days from the date of this letter.

Please be advised that once this revocation is effective the source will no longer have approval to operate any emission units at this source. In addition, if there is a need in the future to operate any units at this source, construction and operation approval will be necessary pursuant to Indiana's New Source Review regulations. Once effective, this revocation cannot be withdrawn or rescinded.

A copy of the revocation is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

If you have any questions regarding this matter, please contact Nicholas Walters, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-9513 or (800) 451-6027, and ask for Nicholas Walters or (317) 234-9513.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

cc: File - Owen County
Owen County Health Department
Compliance and Enforcement Branch